

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

TECSEC, INC.,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:10-cv-115-LO/TCB
v.	)	
	)	
INTERNATIONAL BUSINESS	)	
MACHINES CORPORATION, et al.,	)	
	)	
Defendants.	)	
_____	)	

**TECSEC, INC.'S MOTION IN LIMINE**

Pursuant to the Scheduling Order entered by the Court on September 5, 2018 (Dkt. No. 1185), Plaintiff TecSec, Inc. ("TecSec") respectfully moves this Court *in limine* to preclude Adobe Systems, Incorporated ("Adobe") from soliciting or offering at trial the following:

1. Any testimony, evidence, statement or argument concerning excluded and withdrawn prior art references, including PKZIP and TISPEM.
2. Any testimony, evidence, statement or argument concerning computers, software or other materials that were not produced in an accessible form prior to the close of fact discovery.
3. Non-infringement related opinion testimony by John Landwehr, Leonard Rosenthol or Phil Ydens.
4. Testimony by Russ Mundy.
5. Testimony by David Balenson or William Barker.
6. Testimony by Doug Brotz.
7. Any testimony, evidence, statement or argument concerning TecSec's claims against other parties in the present lawsuit.

8. Any testimony, evidence, statement or argument concerning the pretrial withdrawal or dismissal of patent infringement claims not being asserted at trial or products that are no longer being accused of infringement.

9. Testimony by Roy Follendore.

The grounds for this motion are set forth in the accompanying Memorandum in Support of TecSec, Inc.'s Motion in Limine.

TecSec's counsel and Adobe's counsel conferred about these issues by telephone on October 8 and 11, but were unable to reach an agreement.

Dated: October 12, 2018

Respectfully submitted,

/s/ Michael A. Oakes

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*Counsel for Plaintiff TecSec, Incorporated*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of October, 2018, a true and correct copy of the foregoing pleading or paper was served using the Court's CM/ECF system, with electronic notification of such filing to all counsel of record.

/s/ Michael A. Oakes

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